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13 *Anilox Roll Company, Inc. d/b/a*  
14 *ARC International, Inc.*

15 UNITED STATES DISTRICT COURT  
16 DISTRICT OF NEVADA

17 CHARLIE RESOSO,  
18 Plaintiff,

19 v.

20 CLAUSING INDUSTRIAL, INC., ANILOX  
21 ROLL COMPANY WEST, INC. d/b/a ARC  
22 INTERNATIONAL; ANILOX ROLL  
23 COMPANY, INC. d/b/a ARC  
24 INTERNATIONAL, inclusive,

25 Defendants.

26 CLAUSING INDUSTRIAL, INC.

27 Cross-Claimant,

28 v.

ANILOX ROLL COMPANY, INC.

Cross-Defendant.

CASE NO.: 2:14-cv-00102-RFB-GWF

**STIPULATION AND ORDER**  
**REGARDING THE FILING DEADLINE**  
**FOR ANILOX ROLL COMPANY, INC.'S**  
**MOTION TO FURTHER STAY**  
**DISCLOSURE OF EXPERT WITNESSES**  
**(Third Request)**

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1 IT IS HEREBY STIPULATED by and between Plaintiff CHARLIE RESOSO  
2 ("PLAINTIFF"), by and through his counsel of record, WILLIAM R. BRENSKE, ESQ. of the law  
3 firm of BRENSKE & ANDREEVSKI; Defendant/Cross-Defendant ANILOX ROLL COMPANY,  
4 INC. d/b/a ARC INTERNATIONAL ("ARC EAST"), by and through its counsel of record,  
5 GRIFFITH H. HAYES, ESQ. and KEIVAN A. ROEBUCK, ESQ. of the law firm of LITCHFIELD  
6 CAVO LLP; and Defendant CLAUSING INDUSTRIAL, INC. ("CLAUSING"), by and through its  
7 counsel of record, GEORGE D. YARON, ESQ. and KEITH E. PATTERSON, ESQ. of the law firm  
8 of YARON & ASSOCIATIES, that:

- 9  
10 1. On September 28, 2017, ARC EAST filed its Motion for Summary Judgment ("MSJ").
- 11 2. On September 29, 2017, ARC EAST's Motion for Protective Order Regarding the FRCP  
12 30(b)(6) Deposition of ARC EAST was heard by United States Magistrate Judge George  
13 W. Foley. At the hearing, the Court held in abeyance ARC EAST's disclosure of expert  
14 witnesses pending a further ruling by the Court on ARC EAST's MSJ. The Court further  
15 held that should the Court deny the MSJ, the parties will be given adequate time to  
16 designate/disclose expert witnesses, rebuttal witnesses and complete disclosure, as  
17 discussed in open court. It also ordered ARC EAST to file a motion to further stay  
18 disclosure of its experts ("Motion to Stay Expert Disclosures").
- 19 3. Because of a family emergency concerning one of ARC EAST's FRCP 30(b)(6) deponents,  
20 ARC EAST needed to move the FRCP 30(b)(6) deposition to a later date. ARC EAST  
21 produced five witnesses pursuant to requests from counsel for PLAINTIFF and  
22 CLAUSING. The depositions of the five witnesses did not conclude until January 24, 2018.
- 23 4. The Court Reporter indicated that the transcripts from ARC EAST's FRCP 30(b)(6)  
24 deposition would be ready by February 5, 2018. However, the transcripts were not  
25 completed by the anticipated date.
- 26 5. To adequately respond to ARC EAST's MSJ, the transcripts needed to be reviewed by  
27 counsel and the parties' experts, if any. Counsel for PLAINTIFF and counsel for  
28 CLAUSING requested counsel for ARC EAST to voluntarily agree to PLAINTIFF and  
CLAUSING having additional time to file a response to ARC EAST's MSJ. The parties

1 stipulated to PLAINTIFF and CLAUSING having until March 12, 2018 to file a response  
2 to ARC EAST's MSJ. The parties also stipulated to ARC EAST having until April 4, 2018  
3 to file its reply in support of its MSJ. This Court has ordered these extended deadlines.

- 4 6. Counsel for ARC EAST must also review the transcripts in order to adequately file its  
5 Motion to Stay Expert Disclosures. Before filing its Motion to Stay Expert Disclosures,  
6 however, counsel for ARC EAST must review the responses of PLAINTIFF and  
7 CLAUSING to ARC EAST's MSJ and then file a reply in support of ARC EAST's MSJ.  
8 As a result of the foregoing, counsel for ARC EAST has requested that counsel for  
9 PLAINTIFF and counsel for CLAUSING voluntarily agree to allow ARC EAST to have  
10 additional time to file its Motion to Stay Expert Disclosures. The current deadline is March  
11 23, 2018. The parties hereby stipulate that ARC EAST shall have until April 13, 2018 to  
12 file its Motion to Stay Expert Disclosures.

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1 The undersigned respectively have the authority to execute this Stipulation and bind the  
2 respective parties hereto.


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4 DATED this 20th day of March, 2018.

5 **BRENSKE & ANDREEVSKI**

6 By: /s/ William R. Brenske  
7 WILLIAM R. BRENSKE, ESQ.  
8 3800 Howard Hughes Pkwy, Suite 500  
9 Las Vegas, Nevada 89169  
10 *Attorneys for Plaintiff Charlie Resoso*

DATED this 20th day of March, 2018.

**LITCHFIELD CAVO LLP**

By:   
GRIFFITH H. HAYES, ESQ.  
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Las Vegas, Nevada 89169  
*Attorneys for Defendant/Cross-Defendant Anilox  
Roll Company, Inc. d/b/a ARC International, Inc.*

11 DATED this 20th day of March, 2018.

12 **YARON & ASSOCIATES**

13 By: /s/ Keith E. Patterson  
14 GEORGE D. YARON, ESQ.  
15 KEITH E. PATTERSON, ESQ.  
16 1300 Clay Street, Suite 800  
17 Oakland, CA 94612  
*Attorneys for Defendant/Cross-Claimant  
Clausing Industrial, Inc.*

18 IT IS SO ORDERED.

19 DATED this 21st day of March, 2018

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21 UNITED STATES MAGISTRATE JUDGE  
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